

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Estate of Michele M. Walker)	
)	
v.)	Civil Action # 11-CV-421-PB
)	
New Hampshire Administrative Offices of)	
the Courts, et al.)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY TO DEFENDANTS’
OBJECTION TO PLAINTIFF’S MOTION TO COMPEL**

NOW COMES the Estate of Michele M. Walker – Charles E. Walker, Administrator, Plaintiff, by and through its attorney, Law Office of Leslie H. Johnson, PLLC, and respectfully submits Plaintiff’s Motion For Leave To File Reply To Defendants’ Objection To Plaintiff’s Motion To Compel, and in support thereof states as follows:

INTRODUCTION

1. Plaintiff filed its Motion to Compel on or about October 31, 2012, and Defendants filed their Objection to Plaintiff’s Motion to Compel on November 13, 2012. The Plaintiff gave timely notice of intent to file a reply on or about November 16, 2012, and files this motion and the Reply within the time limit, as set forth in LR 7.1 e 2.

2. Defendants objected citing some cases which Plaintiff believes actually support its motion, instead of Defendants’ position. In addition, Defendants make some factual assertions which are disputed.

3. Plaintiff will address only portions of Defendants’ Objection as deemed warranted and necessary, and believes same will be an aid to the Court. Plaintiff’s Reply is attached hereto as Exhibit 1.

4. Plaintiff has made specific requests with regard to particularly interrogatory answers. Defendants have objected based on broad categories. Plaintiff relies on its specific requests contained in its Motion.

5. Plaintiff’s counsel has contacted Defendants’ counsel MaryAnn Dempsey, who

does not assent to this Motion.

6. No memorandum of law is necessary as the granting of this motion is within the Court's discretion.

WHEREFORE, Plaintiff respectfully requests this Honorable Court:

A. Grant Plaintiff's Motion For Leave To File Reply to Defendants' Objection to Plaintiff's Motion to Compel; and

B. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,
Estate of Michele Walker, Plaintiff
By its attorney

Dated: November 27, 2012

/s/ LESLIE H. JOHNSON
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CERTIFICATE

I hereby certify that a copy of the foregoing was electronically served upon Mary Ann Dempsey, Sr. Assistant Attorney General.

Dated: November 27, 2012

/s/ LESLIE H. JOHNSON
Leslie H. Johnson, Esquire